

August 25, 2022

Via CM/ECF and EMAIL

Hon. Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 12C
New York, NY 10007-1312
Tel.: (212) 805-0296
Email: WoodsNYSDChambers@nysd.uscourts.gov

**Re: *United States v. Bhardwaj*, No. 1:22-cr-00398-GHW
Defendants' Unopposed Request for Second Extension of Time
to Meet Bail Conditions**

Dear Judge Woods:

We write on behalf of all Defendants in the above-captioned matter to request a second reasonable extension to September 9, 2022, for our clients to satisfy the remaining bail conditions imposed by the Court during our clients' arraignment on August 2, 2022. We have conferred with the government, which consents to the requested extension.

On August 2, our clients appeared telephonically for their arraignment before the Honorable Katharine H. Parker. Judge Parker set bail conditions for each Defendant and released each on his own signature with remaining bail conditions for Defendant Abbas Saeedi to be met within 10 days [ECF No. 11], for Defendant Srinivasa Kakkerla to be met within 10 days [ECF No. 19], and for Defendant Amit Bhardwaj to be met within 14 days [ECF No. 15]. On August 12, all Defendants requested that the Court grant an extension until August 26 (tomorrow) for Defendants to satisfy the remaining bail conditions [ECF No. 29], which request the Court granted [ECF No. 30].

Since August 12, counsel for Defendants have continued to work diligently with the government to satisfy the remaining bail conditions, including conferring in person following the Court's August 17 status conference as well as over telephone and email. Despite such efforts, Defendants respectfully request another modest extension of time to ensure compliance, in particular so that financially independent cosigners for Defendants can be approved by the government and Defendants can complete the proper steps to secure their bonds with cash or property.

Hon. Gregory H. Woods
Page 2 of 2

Accordingly, Defendants respectfully request an extension of time to September 9, 2022, to satisfy the Court's remaining bail conditions.

Respectfully submitted,

/s/ Max C. Nicholas

Max C. Nicholas
Spears & Imes LLP
51 Madison Avenue
New York, NY 10010
Tel.: 212-213-1715
Email: mnicholas@spearsimes.com

Counsel for Defendant Amit Bhardwaj

/s/ Adam C. Ford

Adam C. Ford
Ford O'Brien Landy LLP
275 Madison Avenue, 24th Floor
New York, NY 10016
Tel.: 212-858-0040
Email: aford@fordobrien.com

Counsel for Defendant Srinivasa Kakkerla

/s/ Nelson A. Boxer

Nelson A. Boxer
Petrillo Klein & Boxer LLP
655 Third Ave, 22nd Floor
New York, NY 10017
Tel.: 212-370-0338
Email: nboxer@pkbllp.com

Counsel for Defendant Abbas Saeedi